

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FRANK CARBONE, ANDREW CORZO,  
SAVANNAH ROSE EKLUND, SIA HENRY,  
ALEXANDER LEO-GUERRA, MICHAEL  
MAERLENDER, BRANDON PIYEVSKY, KARA  
SAFFRIN, and BRITTANY TATIANA WEAVER,  
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE  
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,  
THE TRUSTEES OF COLUMBIA UNIVERSITY IN  
THE CITY OF NEW YORK, CORNELL  
UNIVERSITY, TRUSTEES OF DARTMOUTH  
COLLEGE, DUKE UNIVERSITY, EMORY  
UNIVERSITY, GEORGETOWN UNIVERSITY, THE  
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY, NORTHWESTERN  
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU  
LAC, THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, WILLIAM MARSH RICE  
UNIVERSITY, VANDERBILT UNIVERSITY, and  
YALE UNIVERSITY,

Defendants.

**Case No. 1:22-cv-00125**

**Hon. Matthew F. Kennelly**

**STIPULATION OF PARTIAL  
VOLUNTARY DISMISSAL  
PURSUANT TO FED. R. CIV.  
P. 41**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties, by their undersigned counsel, hereby stipulate that Plaintiff Kara Saffrin's claims against Defendants shall be dismissed with prejudice and without costs or attorneys' fees to any party.

Dated: November 1, 2022

By: /s/ Edward J. Normand  
Velvel (Devin) Freedman  
Edward J. Normand  
Peter Bach-y-Rita  
**FREEDMAN NORMAND  
FRIEDLAND LLP**  
99 Park Avenue  
Suite 1910  
New York, NY 10016  
Tel: 646-970-7513  
vel@fnf.law  
tnormand@fnf.law  
pbachyrita@fnf.law

Eric L. Cramer  
Caitlin G. Coslett  
**BERGER MONTAGUE PC**  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Tel: 215-875-3000  
ecramer@bm.net  
ccoslett@bm.net

Elizabeth A. Fegan  
**FEGAN SCOTT LLC**  
150 S. Wacker Dr., 24th floor  
Chicago, IL 60606  
Tel: 312-741-1019  
beth@feganscott.com

Robert D. Gilbert  
Elpidio Villarreal  
Alexis Marquez  
**GILBERT LITIGATORS &  
COUNSELORS, P.C.**  
11 Broadway, Suite 615  
New York, NY 10004  
Tel: 646-448-5269  
rgilbert@gilbertlitigators.com  
pdvillarreal@gilbertlitigators.com  
amarquez@gilbertlitigators.com

Daniel J. Walker  
Robert E. Litan  
Hope Brinn  
**BERGER MONTAGUE PC**  
2001 Pennsylvania Avenue, NW  
Suite 300  
Washington, DC 20006  
Tel: 202-559-9745  
rlitan@bm.net  
dwalker@bm.net  
hbrinn@bm.net

Brooke Achua  
**FEGAN SCOTT LLC**  
140 Broadway  
46th Floor  
New York, NY 10005  
Tel.: 646- 502-7910  
brooke@feganscott.com

*Counsel for Plaintiffs*

By: /s/ Kenneth Michael Kliebard

Kenneth Michael Kliebard

**Morgan Lewis & Bockius LLP**

110 N. Wacker Drive

Suite 2800

Chicago, IL 60606

Tel: (312) 324-1000

Email: kenneth.kliebard@morganlewis.com

Jon R. Roellke\*

**Morgan, Lewis & Bockius LLP**

1111 Pennsylvania Avenue, NW

Washington, DC 20004

Tel: (202) 739-5754

Email: jon.roellke@morganlewis.com

Noah J. Kaufman\*

**Morgan, Lewis & Bockius LLP**

One Federal Street

Boston, MA 02110

Tel: (617) 341-7590

Email: noah.kaufman@morganlewis.com

Sujal J. Shah\*

**Morgan, Lewis & Bockius LLP**

One Market, Spear Street Tower

San Francisco, CA 94105

Tel: (415) 442-1000

Email: sujal.shah@morganlewis.com

*Attorneys for Defendant Brown University*

/s/ Deepti Bansal

Deepti Bansal

Alexander J. Kasner\*

**Cooley LLP**

1299 Pennsylvania Avenue, NW 700

Washington, DC 20001

Tel: (202) 728-7027

Email: dbansal@cooley.com

Email: akasner@cooley.com

Matthew Lawrence Kutcher  
**Coolley LLP**  
110 N. Wacker Drive  
Suite 4200  
Chicago, IL 60606  
Tel: (312) 881-6500  
Email: mkutcher@coolley.com

*Attorneys for Defendant California Institute of Technology*

/s/ James L. Cooper  
James L. Cooper  
Michael Rubin\*  
**Arnold & Porter**  
601 Massachusetts Avenue NW  
Washington, DC 20001  
Tel: (202) 945-5000  
Email: james.cooper@arnoldporter.com  
Email: michael.rubin@arnoldporter.com

Leah Harrell\*  
**Arnold & Porter**  
250 West 55th Street  
New York, NY 10019  
Tel: (212) 836-7767  
Email: leah.harrell@arnoldporter.com

Valarie Hays  
**Arnold & Porter**  
70 W Madison Street  
Suite 4200  
Chicago, IL 60602  
Tel: (312) 583-2440  
Email: valarie.hays@arnoldporter.com

*Attorneys for Defendant University of Chicago*

/s/ Patrick Joseph Fitzgerald

Amy Van Gelder

Patrick Joseph Fitzgerald

Laura Bernescu

**Skadden Arps Slate Meager & Flom LLP**

155 N. Wacker Drive

Suite 2700

Chicago, IL 60606

Tel: (312) 407-0903

Email: amy.vangelder@skadden.com

Email: patrick.fitzgerald@skadden.com

Email: laura.bernescu@skadden.com

Karen Hoffman Lent\*

**Skadden Arps Slate Meager & Flom LLP**

One Manhattan West

Room 40-216

New York, NY 10001

Tel: (212) 735-3276

Email: karen.lent@skadden.com

*Attorneys for Defendant The Trustees of Columbia University in the City of New York*

/s/ Norman Armstrong

Christopher Yook\*

Norman Armstrong, Jr.\*

**King & Spalding**

1700 Pennsylvania Avenue, NW

Suite 200

Washington, DC 20006

Tel: (202) 626-3737

Email: cyook@kslaw.com

Email: narmstrong@kslaw.com

Emily T. Chen\*

**King & Spalding**

1185 Avenue of the Americas

34th Floor

New York, NY 10036

Tel: (212) 556-2224

Email: echen@kslaw.com

Zachary Thomas Fardon

**King & Spalding**

110 North Wacker Drive

Suite 3800

Chicago, IL 60606  
Tel: (312) 995-6333  
Email: zfardon@kslaw.com

*Attorneys for Defendants Cornell University and William Marsh Rice University*

/s/ Terri Lynn Mascherin

Terri Lynn Mascherin  
Lina Ragep Powell  
Reid J. Schar  
**Jenner & Block LLP**  
353 N. Clark Street  
Chicago, IL 60654  
Tel: (312) 222-9350  
Email: tmascherin@jenner.com  
Email: linapowell@jenner.com  
Email: rschar@jenner.com

Douglas E. Litvack\*  
Ishan K. Bhabha\*  
Lauren J. Hartz\*  
**Jenner & Block LLP**  
1099 New York Avenue, NW  
Suite 900  
Washington, DC 20001  
Tel: (202) 637-6357  
Email: dlitvack@jenner.com  
Email: ibhabha@jenner.com  
Email: lhartz@jenner.com

*Attorneys for Defendant Trustees of Dartmouth College*

/s/ Casey T. Grabenstein

Casey T. Grabenstein  
Elizabeth Anne Thompson  
James A. Morsch  
**Saul Ewing Arnstein & Lehr**  
161 N. Clark Street  
Chicago, IL 60601  
Tel: (312) 876-7810  
Email: casey.grabenstein@saul.com  
Email: elizabeth.thompson@saul.com  
Email: jim.morsch@saul.com

Joshua W. B. Richards\*  
**Saul Ewing Arnstein & Lehr**

Centre Square West  
1500 Market Street  
Philadelphia, PA 19102  
Tel: (215) 972-7777  
Email: joshua.richard.saul.com

Christopher Dean Dusseault\*  
Jacqueline Sesia\*  
**Gibson, Dunn & Crutcher LLP**  
333 South Grand Avenue  
Los Angeles, CA 90071  
Tel: (213) 229-7855  
Email: cdusseault@gibsondunn.com  
Email: jsesia@gibsondunn.com

Rachel Susan Brass\*  
**Gibson, Dunn & Crutcher LLP**  
555 Mission Street, Suite 3000  
San Francisco, CA 94105  
Tel: (415) 393-8200  
Email: rbrass@gibsondunn.com

*Attorneys for Defendant Duke University*

/s/ Tina M. Tabacchi  
Tina M. Tabacchi  
Kenneth Michael Kliebard  
**Jones Day**  
110 North Wacker Drive  
Suite 4800  
Chicago, IL 60601  
Tel: (312) 782-3939  
Email: tmtabacchi@jonesday.com  
Email: kenneth.kliebard@morganlewis.com

Christopher N. Thatch\*  
Craig A. Waldman\*  
Hashim M. Moopan\*  
**Jones Day**  
51 Louisiana Avenue, NW  
Washington, DC 20001  
Tel: (202) 879-3939  
Email: cthatch@jonesday.com  
Email: cwaldman@jonesday.com  
Email: hmmoopan@jonesday.com

Kate Wallace\*

**Jones Day**

100 High Street

21st Street

Boston, MA 02110

Tel: (617) 960-3939

Email: kwallace@jonesday.com

*Attorneys for Defendant Emory University*

/s/ Britt Marie Miller

Britt Marie Miller

Jed Wolf Glickstein

**Mayer Brown LLP**

71 South Wacker Drive

Chicago, IL 60606

Tel: (312) 782-0600

Email: bmiller@mayerbrown.com

Email: jglickstein@mayerbrown.com

*Attorneys for Defendant Georgetown University*

/s/ Jeffrey J. Bushofsky

Jeffrey J. Bushofsky

**Ropes & Gray LLP**

191 North Wacker Drive

32nd Floor

Chicago, IL 60606

Tel: (312) 845-1200

Email: jeffrey.bushofsky@ropesgray.com

Chong S. Park

Samer Makram Musallam

**Ropes & Gray LLP**

2099 Pennsylvania Avenue, NW

Washington, DC 20006

Tel: (202) 508-4631

Email: chong.park@ropesgray.com

Email: samer.musallam@ropesgray.com

*Attorneys for Defendant The Johns Hopkins University*

/s/ Eric J. Mahr

Daphne Lin\*

Eric J. Mahr\*

Jan Rybnicek\*



**Freshfields Bruckhaus Deringer**

700 13th Street NW  
10th Floor  
Washington, DC 20005  
Tel: (202) 777-4500  
Email: daphne.lin@freshfields.com  
Email: eric.mahr@freshfields.com  
Email: jan.rybnicek@freshfields.com

Jennifer L. Greenblatt

Rami N. Fakhouri

**Goldman Ismail Tomaselli Brennan & Baum LLP**

200 South Wacker Drive  
22nd Floor  
Chicago, IL 60606  
Tel: (312) 661-6000  
Email: jgreenblatt@goldmanismail.com  
Email: rfakhouri@goldmanismail.com

*Attorneys for Defendant Massachusetts Institute of Technology*

/s/ Scott David Stein

Scott David Stein  
Benjamin Richard Brunner  
Kelsey Annu-essuman  
**Sidley Austin LLP**  
1 South Dearborn Street  
Chicago, IL 60603  
Tel: (312) 853-7000  
Email: sstein@sidley.com  
Email: bbrunner@sidley.com  
Email: kannuessuman@sidley.com

*Attorneys for Defendant Northwestern University*

/s/ Robert Alois Van Kirk

Robert Alois Van Kirk  
Cole Thomas Wintheiser  
Jonathan Pitt  
Matthew David Heins  
Sara Forsythe Kirkpatrick  
**Williams & Connolly LLP**  
680 Maine Avenue SW  
Washington, DC 20024  
Tel: (202) 434-5163  
Email: rvankirk@wc.com

Email: cwintheiser@wc.com  
Email: jpitt@wc.com  
Email: mheins@wc.com  
Email: skirkpatrick@wc.com

James Peter Fieweger  
**Michael Best & Friedrich LLP**  
444 West Lake Street  
Suite 3200  
Chicago, IL 60606  
Tel: (312) 222-0800  
Email: jpfieweger@michaelbest.com

*Attorneys for Defendant University of Notre Dame du Lac*

/s/ Seth P. Waxman  
Seth P. Waxman  
**Wilmer Cutler Pickering Hale and Dorr LLP**  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006  
Tel: (202) 663-6000  
Email: seth.waxman@wilmerhale.com

Alan Schoenfeld\*  
David Gringer\*  
**Wilmer Cutler Pickering Hale and Dorr LLP**  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
Tel: (212) 937-7294  
Email: alan.schoenfeld@wilmerhale.com  
Email: david.gringer@wilmerhale.com

Daniel Martin Feeney  
Edward W. Feldman  
**Miller Shakman Levine & Feldman LLP**  
30 West Monroe Street, 19th Floor  
Chicago, IL 60603  
Tel: (312) 263-3700  
Email: dfeeney@millershakman.com  
Email: efeldman@millershakman.com

*Attorneys for Defendant The Trustees of the University of Pennsylvania*

/s/ John Mark Gidley  
John Mark Gidley\*

**White & Case LLP**

701 13th Street, NW  
Washington, DC 20005  
Tel: (202) 626-3600  
Email: mgidley@whitecase.com

Robert A. Milne  
David H. Suggs\*

**White & Case LLP**

1221 Avenue of the Americas  
New York, NY 10020  
Tel: (212) 819-8200  
Email: rmilne@whitecase.com  
Email: dsuggs@whitecase.com

Carolyn Pelling Gurland

**White & Case LLP**

111 S. Wacker Drive  
Suite 5100  
Chicago, IL 60606  
Tel: (312) 881-5405  
Email: carolyn.gurland@whitecase.com

*Attorneys for Defendant Vanderbilt University*

/s/ Charles A. Loughlin

Charles A. Loughlin

Benjamin F. Holt\*

Jamie Lee

Molly Pallman

**Hogan Lovells US LLP**

555 Thirteenth Street, NW  
Washington, DC 20004  
Tel: (202) 637-5661  
Email: chuck.loughlin@hoganlovells.com  
Email: benjamin.holt@hoganlovells.com  
Email: jamie.lee@hoganlovells.com  
Email: molly.pallman@hoganlovells.com

Stephen Novack

Serena Georgette Rabie

Stephen J. Siegel

**Novack and Macey LLP**

100 North Riverside Plaza  
Chicago, IL 60606  
Tel: (312) 419-6900

Email: [snovack@novackmacey.com](mailto:snovack@novackmacey.com)

Email: [srabie@novackmacey.com](mailto:srabie@novackmacey.com)

Email: [ssiegel@novackmacey.com](mailto:ssiegel@novackmacey.com)

*Attorneys for Defendant Yale University*

*\*Pro hac vice*